

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JACQUELINE D. BERRY,	:		
	:		
Plaintiff,	:		
	:		
v.	:	C.A.No. 06-217-GMS	
	:		
STATE OF DELAWARE,	:		
DIVISION OF CHILD SUPPORT,	:		
	:		
Defendant.	:		

1st REQUEST FOR PRODUCTION DIRECTED TO PLAINTIFF

Defendant hereby requests that Plaintiff produce at Defendant's attorneys' office for the purpose of inspection and copying, all of the following documents or evidence within 30 days pursuant to Fed.R.Civ.P. 34. These requests for production are continuing and the items requested must be kept current by supplementation.

As used in this request for production, "you" or "yours" means and refers to plaintiff, her attorney(s) and their agents and employees.

Defendant request Plaintiff produce complete originals of the following:

1. Any and all documents and tangible things referred to in plaintiff's complaints in this matter.
2. Any and all documents and tangible things identified or that should be identified in response to defendant's interrogatories.
3. Any and all reports, including drafts, by an expert retained by plaintiff in connection with this matter as well as his or her current qualifications, and any documents

supplied or reviewed by that individual.

4. Any and all statements, in writing or oral, by any party or witness, in any form, relating to the incidents that form the basis of this lawsuit.

5. Any and all videotapes, audiotapes, or photographs taken by you that refers or relates to any claim or defense in the present matter.

6. Any and all medical records or reports regarding the examination or treatment of plaintiff.

7. Any and all documents or physical evidence that supports any claim of Plaintiff for damages of any nature.

8. Any and all applications for employment or self-employment for the last 7 years.

9. Any and all federal and State tax returns for the last 5 years.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Marc P. Niedzielski
Marc P. Niedzielski (#2616)
Deputy Attorneys General
820 North French Street
6th Floor
Wilmington, DE 19801
(302) 577-8324

DATED: September 5, 2006

NOTICE OF SERVICE

The undersigned certifies that on September 5, 2006, he caused two (2) copies of the Defendant's 1st Set of Request for Production be served on the following person by regular U.S. Mail:

NAME AND ADDRESS OF RECIPIENT(S):

Jacqueline D. Berry 5018 Oak Pasture Lane Charlotte, NC 28269	
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STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Marc P. Niedzielski
Marc P. Niedzielski, I.D. #2616
Deputy Attorney General
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820 N. French Street, 6th floor
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Attorney for Defendant